

MEMO ENDORSED

LAW OFFICES
DAVID WIKSTROM
250 WEST 55TH STREET, 17TH FLOOR
NEW YORK, NY 10019

USDC SDNY
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E-MAIL: DAVID@DAVIDWIKSTROM.COM
WWW.DAVIDWIKSTROM.COM

TELEPHONE: (212) 248-5511
FACSIMILE: (212) 248-2866

September 5, 2024

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Re: United States v. Kareem Brown
24 CR 215 (VEC)

Dear Judge Caproni:

By this letter motion Kareem Brown respectfully moves for a bail modification to permit travel to Atlanta, GA between September 16th and 20th, 2024. Assistant United States Attorney Ben Burkett informs me that the Government opposes the application.

Mr. Brown continues to be in full compliance with the terms of his bail. This is the first instance in which he has moved for a bail modification since the case began. He has not received notice of designation yet, but expects to surrender as scheduled on October 1st.

Mr. Brown has had a long relationship with Tamira Smith (PSR ¶ 76); Ms. Smith resides in Atlanta. He is also married to Irene Nathaniel (*id.*). Mr. Brown needs to clarify and resolve this situation prior to his incarceration, and understandably wants to do this personally. Accordingly, he requests that your Honor approve this application. If so, he will of course provide his travel details and precise location to Pretrial Services, in advance.

Pretrial Services Officer Francesca Piperato informs me Mr. Brown's pretrial compliance has been exemplary and that she would have no specific objection to travel, but that it is Pretrial's policy to oppose social travel for defendants in all cases where, as here, home detention was ordered. Nevertheless I believe that Mr. Brown—having already been deemed a "good candidate" for voluntary surrender by the Probation Department (*see* PSR p. 36)—will absolutely display the same adherence in this instance. I therefore respectfully request that the Court authorize the travel.

Respectfully,


David Wikstrom

Application GRANTED. Defendant must provide Pretrial Services with the address at which he will be staying during his travel.

SO ORDERED.

 9/6/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE